

Via ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
RE: GN Docket No. 17-258
445 12th Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

InfoWest is a small business with 30 employees that provides fixed wireless broadband internet service to more than 7,000 customers in Southern Utah and small rural parts of Nevada and Arizona. Much of our service area is in areas where there are no other broadband choices available. We primarily use FCC approved "unlicensed" or "light licensed" devices in the 5GHz and 3.65GHz spectrum. We have been providing service to the area since 1994.

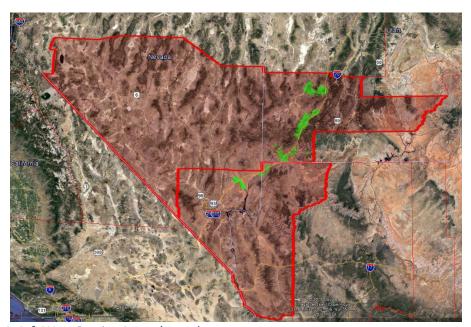


Figure 1- InfoWest Service Areas (green)

We have been watching developments in the CBRS band and view the planned availability of additional CBRS spectrum as critical to serving our customer base in the future, especially in rural areas. We hope to obtain PALs under the planned CBRS rules adopted in April of 2015 to keep pace with our growing customer base and spectrum needs.

Proposed changes to the CBRS rules will make it virtually impossible for a company of our size to obtain such licenses. Proposed changes will require PAL bidders to bid on large Partial Economic Areas (PEAs), instead of census blocks. In our market, we provide service in two separate PEAs. One PEA (St. George Utah) covers an area larger than 50,000 square miles. The second PEA includes the Las Vegas metropolitan area with a population over 2 million, while we only seek to serve communities like Overton Nevada and Beaver Dam Arizona with populations in the thousands. The total area of these two PEAs is larger than all but seventeen of the fifty states.





Figure 2- St. George UT and Las Vegas NV PEAs

By allocating PALs based on Partial Economic Areas (PEA), only large carriers will be able to acquire PALs and will result in wasted spectrum for areas that will likely never be serviced. By retaining the existing rules, smaller innovative companies like ours will be able to compete for smaller, underserved areas, while larger carriers can focus their investments on high-density areas where they currently need more spectrum allocation.

At this point we continue to investigate CBRS options including LTE and 5G for future use, but we cannot make rational investments based on the uncertainty of the proposed rule changes. InfoWest opposes the proposals to increase the size of the PALs to the size of a PEA. We do eagerly anticipate being able to bid on smaller census tract-sized PALs. Please allow us to continue to invest and innovate on behalf of the under-served populations in the desert southwest.

Sincerely,

Randy Cosby Vice President InfoWest, Inc.